

**CAUSE NO.**

THOMAS BRAHIN	§	IN THE DISTRICT COURT OF
	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
SEADRILL AMERICAS, INC. and	§	
SEADRILL GULF OPERATIONS	§	
NEPTUNE, LLC	§	_____ JUDICIAL DISTRICT
Defendants	§	
	§	

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**PLAINTIFF'S ORIGINAL PETITION**


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TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, THOMAS BRAHIN, (the "Plaintiff") complaining of and against Defendants, SEADRILL AMERICAS, INC. and SEADRILL GULF OPERATIONS NEPTUNE, LLC, (hereinafter collectively "SEADRILL") and files *Plaintiff Original Petition*, and would respectfully show unto the Court the following:

**I.**  
**INTRODUCTORY ALLEGATIONS**

**A. PARTIES**

1. Plaintiff, Thomas Brahin is a natural person who is domiciled in Webb City, Missouri.

2. Defendant, Seadrill Americas, Inc. is a corporation engaged in providing drilling services in the Gulf Coast region of the United States and many other regions. Seadrill's principal place of business is located at 11025 Equity Drive, Suite 150, Houston, Harris County, Texas 77041 where its high-level officers direct, control, and coordinate the company's business activities. They may be served with process by serving their registered agent, C T Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

3. Defendant, Seadrill Gulf Operations Neptune, LLC is a corporation engaged in providing drilling services in the Gulf Coast region of the United States and many other regions. Seadrill's principal place of business is located at 11025 Equity Drive, Suite 150, Houston, Harris County, Texas 77041 where its high-level officers direct, control, and coordinate the company's business activities. They may be served with process by serving their registered agent, C T Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

**B. VENUE AND JURISDICTION**

4. Venue is proper in Harris County, Texas pursuant to Section 15.0181 (c) and (e) of the Texas Civil Practice & Remedies Code in that Seadrill's principal place of business is located in Harris County, Texas.

5. Additionally, Plaintiff specifically invokes his rights under Texas Civil Practice & Remedies Code, Section 71.031, which is commonly known as the "open forum" provision, and chooses to maintain this action in the state district courts of Texas.

6. It has become necessary to bring this suit by reason of serious and permanent injuries sustained by Plaintiff on or about February 6, 2021, while working as a member of the crew assigned to a drill ship known as the *West Neptune*. This suit is, therefore, instituted under and controlled by the terms and provisions of Title 46, United States Code Annotated, Section 30104 and following, commonly referred to as the "Jones Act" and the general maritime law of the United States. Accordingly, Plaintiff chooses this venue to pursue his claims under the "Saving to Suitors" clause, 28 U.S.C. § 1333(1).

7. Plaintiff states that the exact amount of Plaintiff's damages is unknown, but are clearly within the jurisdictional limits of this Court. Plaintiff seeks monetary damages in excess

of \$1,000,000, excluding any punitive damages, interest, or costs. Plaintiff reserves the right to decrease or increase this amount as further information becomes available.

8. Plaintiff would also show that the Court has personal jurisdiction over Defendant. Defendant has had, and continues to have, continuous systematic contacts with the State of Texas through doing business in Texas. The exercise of personal jurisdiction over Defendant comports with the “traditional notions of fair play and substantial justice.” Defendant’s contacts with the State of Texas directly relate to this incident within the State of Texas, such that the exercise of jurisdiction over them comports with traditional notions of fair play and substantial justice.

9. This Court has jurisdiction over this case in that the amount in controversy exceeds the minimum jurisdictional limits of this Court.

**C. DISCOVERY CONTROL PLAN**

10. Discovery is intended to be conducted under Level 3 of the Texas Rules of Civil Procedure §190.4.

**II.  
FACTUAL ALLEGATIONS**

11. It has become necessary to bring this lawsuit by reason of serious and permanent injuries sustained by Plaintiff, Thomas Brahın on or about February 6, 2021. At the time of the injuries made the basis of this suit, Defendant, Seadrill Americas employed Plaintiff. Plaintiff was assigned as a member of the drill ship *WEST NEPTUNE*, when he was injured. At pertinent times hereto, the WEST NEPTUNE was owned, operated, controlled, and/or managed by Defendant, Seadrill Americas and/or Seadrill Gulf Operations Neptune, LLC.

12. On or about February 6, 2021, Plaintiff was working as a member of the crew of the drill ship *WEST NEPTUNE*. At that time, Plaintiff was instructed to handle an electrical cord and unplug it from a socket. When doing so, Plaintiff immediately felt an intense shock through

his left hand that radiated up the left arm into his chest, his lower back, and body generally. This caused Plaintiff severe and debilitating injuries.

13. Due to the injuries sustained by Plaintiff, he underwent a posterior instrumentation and fusion with complete facetectomies from L4-S1 performed by Dr. Joseph Graham on June 2, 2021.

### **III. CAUSES OF ACTION**

#### **A. JONES ACT**

14. Plaintiff incorporates the above paragraphs as if more fully stated herein.

15. At the time of the injuries made the basis of this suit, Defendant, Seadrill Americas employed Plaintiff. Plaintiff was assigned as a member of the drill ship *WEST NEPTUNE*, when he was injured. At pertinent times hereto, the *WEST NEPTUNE* was owned, operated, managed, and/or controlled by Defendant, Seadrill Americas.

16. Thus, Plaintiff maintains this lawsuit against Defendant pursuant to the “Jones Act,” 46 U.S.C. § 30104 and the general maritime law of the United States.

#### **B. NEGLIGENCE**

17. Plaintiff incorporates the above paragraphs as if more fully stated herein.

18. Plaintiff would show that nothing he did or failed to do on the occasion in question caused or in any way contributed to cause his injuries. To the contrary, the occurrence in which Plaintiff was injured and the injuries he sustained were legally caused by the negligence, as that term is understood in law, by the Defendant, their agents, servants, and employees, who were acting in the course and scope of their employment for the Defendant at all times material to this action.

19. Specifically, on information and belief, Plaintiff alleges that the sole legal and/or proximate cause of his injuries was due to the negligence of Defendant in the following non-exclusive respects:

- (a) Failing to provide a reasonably safe place to work;
- (b) Failing to properly train and supervise Defendant's employees;
- (c) Failing to take any means or precautions for the safety of Defendant's employees, including Plaintiff;
- (d) Failing to provide and maintain minimum safety requirements;
- (e) Failing to provide adequate personnel and/or safety equipment for the job or tasks in question;
- (f) Failing to follow proper and safe procedures for *WEST NEPTUNE*.

20. Such breaches caused Plaintiff's injuries and damages. Defendant was negligent through the acts and omissions and by and through their agents, servants, and/or employees acting in the course and scope of their respective employment.

### **C. UNSEAWORTHINESS**

21. Plaintiff incorporates the above paragraphs as if more fully stated herein.

22. Plaintiff's injuries occurred while in the service of Defendant, Seadrill Americas' drill ship, the *WEST NEPTUNE*. Seadrill owed to Plaintiff a duty to furnish him a safe place to work and a seaworthy drill ship, and as applied to Plaintiff, Seadrill failed in those respects.

23. The unseaworthiness of the drill ship in question caused the injuries and damages sustained by Plaintiff. These conditions were brought about and caused by Seadrill, their drill ship, and their employees.

24. At all times material hereto, the *WEST NEPTUNE* was owned, chartered, managed, operated, and/or controlled by Seadrill. Seadrill had the absolute nondelegable duty to provide Plaintiff with a seaworthy drill ship.

25. The unseaworthiness of Defendant's ship, the *WEST NEPTUNE*, was a legal cause of injury and damages to Plaintiff by reasons, including but not limited to, the following:

- (a) The *WEST NEPTUNE* was unsafe and not reasonably fit for its intended purpose and/or the task being performed;
- (b) The *WEST NEPTUNE*'s officers and crew were not properly trained, instructed, or supervised;
- (c) The *WEST NEPTUNE* did not have a fit crew at the time of incident in question and was untrained and unskilled;
- (d) The *WEST NEPTUNE* did not have adequate manpower for the task being performed;
- (e) The *WEST NEPTUNE* did not have safe equipment;
- (f) Other acts that may be deemed negligent and/or reckless.

#### **D. MAINTENANCE AND CURE**

26. By reasons of the employment relationship between Plaintiff, as a member of the crew of the drill ship and the Defendant's, Plaintiff is entitled to recover maintenance and cure for such time as he has been and will be either convalescing from his injuries under medical care or reaching his maximum improvement. This suit is, therefore, also maintained for the recovery of maintenance and cure for which the Defendant is obligated to Plaintiff.

#### **IV. DAMAGES**

27. Plaintiff suffered severe bodily injuries as a result of the incident made the basis of this lawsuit. Plaintiff, therefore, seeks recovery of the following damages:

- (a) Past and future physical pain;
- (b) Past and future mental anguish;
- (c) Past and future physical impairment;
- (d) Past and future physical disfigurement;
- (e) Past lost wages and household services;
- (f) Future loss of earning capacity and household services; and
- (g) Past and future medical expenses;

28. Plaintiff further seeks recovery of costs of court and pre-judgment and post-judgment interest on the damages as allowed by law and prays that upon entry of judgment that such pre-judgment interest be computed on all allowable damages.

29. On February 10, 2021, just days after the incident made the basis of suit, each of the defendants, and other affiliates of Seadrill Limited filed for bankruptcy in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Defendants' bankruptcy filings were jointly administered under Case No. 21-30427, *In re Seadrill Limited et al.* On October 26, 2021, an order confirming the Second Amended Joint Plan of Reorganization of Seadrill Limited and its debtor affiliates was entered in the Bankruptcy. On March 28, 2022, a Final Decree was entered in the Bankruptcy closing most of the Debtors' cases, including the cases filed by the Defendants. Due to the terms of the confirmed Plan, suit is being brought by Plaintiff against the Defendants solely to establish the defendants' liability to Plaintiff so that Plaintiff may

collect or settle any judgment obtained from the proceeds of the insurance policies maintained by the Defendants and in effect at the time of the incident giving rise to suit. Specifically, on information and belief, but without limitation, Defendants maintained and continue to maintain insurance coverage for the claims asserted by Plaintiff in this action, and for similar claims, through the Defendants' membership in the GARD AS protection and indemnity club. Plaintiff intends only to collect any judgment and/or settle his claims from the proceeds of any applicable Insurance and/or from any non-Debtor third party.

**VII.  
REQUEST FOR DISCLOSURE**

30. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiff requests that the Defendant disclose within the next 50 days from the date of service of the request, the information or material described in Rule 194.2(a)-(l).

**VIII.  
PRAYER**

31. WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Defendant be cited to appear and answer this lawsuit, that judgment be entered against Defendant, that Plaintiff recover his damages in accordance with the evidence, that Plaintiff recover his costs of court, that Plaintiff recover interest to which he is entitled under the law, and for all other just and equitable relief.



Respectfully submitted,

STEVENSON & MURRAY

/s/ William Robert Hand

JOHN W. STEVENSON, JR.

State Bar No. 19196050

WILLIAM ROBERT HAND

State Bar No. 24078622

24 Greenway Plaza, Suite 750

Houston, Texas 77046

(713) 622-3223 - Telephone

(713) 622-3224 - Facsimile

jstevenson@stevensonmurray.com

rhand@stevensonmurray.com

*Attorneys for Plaintiff*

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Laurie Nichols on behalf of William Hand  
Bar No. 24078622  
lnichols@stevensonmurray.com  
Envelope ID: 65097174  
Status as of 6/3/2022 10:26 AM CST

## Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
John W.Stevenson		jstevenson@stevensonmurray.com	6/3/2022 10:00:02 AM	SENT
William RobertHand		rhand@stevensonmurray.com	6/3/2022 10:00:02 AM	SENT
Laurie Nichols		lnichols@stevensonmurray.com	6/3/2022 10:00:02 AM	SENT



# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

6/3/2022 10:00:02 AM  
 Marilyn Burgess - District Clerk  
 Harris County  
 Envelope No: 65097174  
 By: JONES, PATRICIA D  
 Filed: 6/3/2022 10:00:02 AM

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5809 | www.hcdistrictclerk.com

## Request for Issuance of Service

CASE NUMBER: \_\_\_\_\_ CURRENT COURT: \_\_\_\_\_

Name(s) of Documents to be served: **Plaintiff's Original Petition**

FILE DATE: **06/03/2022**

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: **Seadrill Americas, Inc.**

Address of Service: **1999 Bryan Street, Suite 900**

City, State & Zip: **Dallas, Texas 75201-3136**

Agent (if applicable) **C T Corporation System**

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> <b>Citation</b>	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias	Newspaper _____		
<input type="checkbox"/> Temporary Restraining Order	<input type="checkbox"/> Precept	<input type="checkbox"/> Notice	<input type="checkbox"/>
Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)	<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)	
<input type="checkbox"/> Certiorari	<input type="checkbox"/> Highway Commission (\$12.00)		
<input type="checkbox"/> Commissioner of Insurance (\$12.00)	<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment	
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)	<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration	
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			
(See additional Forms for Post Judgment Service)			

### SERVICE BY (check one):

<input type="checkbox"/> ATTORNEY PICK-UP (phone) _____	<input type="checkbox"/> E-Issuance by District Clerk
<input type="checkbox"/> MAIL to attorney at: _____	(No Service Copy Fees Charged)
<input type="checkbox"/> CONSTABLE	<i>Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.</i>
<input checked="" type="checkbox"/> <b>CERTIFIED MAIL by District Clerk</b>	Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions.
<input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____	Phone: _____
<input type="checkbox"/> OTHER, explain _____	

Issuance of Service Requested By: Attorney/Party Name: **William Robert Hand Bar #: 24078622**

Mailing Address: **Stevenson & Murray, 24 Greenway Plaza, Suite 750, Houston, Texas 77046**

Phone Number: **713-622-3223**

**EXHIBIT A-2**



# Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

6/3/2022 10:00:02 AM  
 Marilyn Burgess - District Clerk  
 Harris County  
 Envelope No: 65097174  
 By: JONES, PATRICIA D  
 Filed: 6/3/2022 10:00:02 AM

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5809 | www.hcdistrictclerk.com

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Name(s) of Documents to be served: **Plaintiff's Original Petition**

FILE DATE: **06/03/2022**

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: **Seadrill Gulf Operations Neptune, LLC**

Address of Service: **1999 Bryan Street, Suite 900**

City, State & Zip: **Dallas, Texas 75201-3136**

Agent (if applicable) **C T Corporation System**

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> <b>Citation</b>	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias	Newspaper _____		
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Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)	<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)	
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<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			
(See additional Forms for Post Judgment Service)			

### SERVICE BY (check one):

<input type="checkbox"/> ATTORNEY PICK-UP (phone) _____	<input type="checkbox"/> E-Issuance by District Clerk
<input type="checkbox"/> MAIL to attorney at: _____	(No Service Copy Fees Charged)
<input type="checkbox"/> CONSTABLE	<i>Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.</i>
<b>X CERTIFIED MAIL by District Clerk</b>	Visit <a href="http://www.hcdistrictclerk.com">www.hcdistrictclerk.com</a> for more instructions.
<input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____	Phone: _____
<input type="checkbox"/> OTHER, explain _____	

Issuance of Service Requested By: Attorney/Party Name: **William Robert Hand Bar #: 24078622**

Mailing Address: **Stevenson & Murray, 24 Greenway Plaza, Suite 750, Houston, Texas 77046**

Phone Number: **713-622-3223**

**EXHIBIT A-3**

p2

7019 2970 0001 3562 0631

CAUSE NO. 202233124

RECEIPT NO. 923639

75.00 CTM

\*\*\*\*\*

TR # 74015982

PLAINTIFF: BRAHIN, THOMAS  
 vs.  
 DEFENDANT: SEADRILL AMERICAS INC

In The 281st  
 Judicial District Court  
 of Harris County, Texas  
 281ST DISTRICT COURT  
 Houston, TX

## CITATION (CERTIFIED)

THE STATE OF TEXAS  
 County of Harris

TO: SEADRILL AMERICAS INC (A CORPORATION) MAY BE SERVED WITH PROCESS BY  
 SERVING THEIR REGISTERED AGENT  
 CT COPORATION SYSTEM

1999 BRYAN STREET SUITE 900 , DALLAS TX 75201 - 3136

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

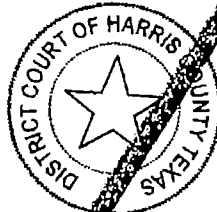
This instrument was filed on the 3rd day of June, 2022, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

TO OFFICER SERVING:

This citation was issued on 14th day of June, 2022, under my hand and seal of said Court.

Issued at request of:  
 HAND, WILLIAM ROBERT  
 24 GREENWAY PLAZA, SUITE 750  
 HOUSTON, TX 77046  
 Tel: (713) 622-3223  
 Bar No.: 24078622



*Marilyn Burgess*

MARILYN BURGESS, District Clerk  
 Harris County, Texas  
 201 Caroline, Houston, Texas 77002  
 (P.O. Box 4651, Houston, Texas 77210)

Generated By: JONES, PATRICIA DAVIS  
 K5H//12028404

## CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by mailing to Defendant certified mail, return receipt requested, restricted delivery, a true copy of this citation together with an attached copy of PLAINTIFF'S ORIGINAL PETITION to the following addressee at address:

\_\_\_\_\_  
 \_\_\_\_\_  
 (a) ADDRESSEE

## ADDRESS

Service was executed in accordance with Rule 106  
 (2) TRCP, upon the Defendant as evidenced by the return receipt incorporated herein and attached hereto at \_\_\_\_\_

on \_\_\_\_\_ day of \_\_\_\_\_,  
 by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason: \_\_\_\_\_

MARILYN BURGESS, District Clerk  
 Harris County, TEXAS

By \_\_\_\_\_, Deputy

N. CITM.P

\*74015982\*

EXHIBIT A-4

RECORDER'S MEMORANDUM  
 This instrument is of poor quality  
 at the time of imaging.

7019 2970 0001 3562 0631

CAUSE NO. 202233124

RECEIPT NO. 923639

75.00 CTM

\*\*\*\*\*

TR # 74015982

PLAINTIFF: BRAHIN, THOMAS  
vs.  
DEFENDANT: SEADRILL AMERICAS INC

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: SEADRILL AMERICAS INC (A CORPORATION) MAY BE SERVED WITH PROCESS BY  
SERVING THEIR REGISTERED AGENT  
CT COPORATION SYSTEM

1999 BRYAN STREET SUITE 900 DALLAS TX 75201 - 3136

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Issued at request of:  
HAND, WILLIAM ROBERT  
24 GREENWAY PLAZA, SUITE 750  
HOUSTON, TX 77046  
Tel: (713) 622-3223  
Bar No.: 24078622



*Marilyn Burgess*

MARILYN BURGESS, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

Generated By: JONES, PATRICIA DAVIS  
K5H//12028404

CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by mailing to Defendant certified mail, return receipt requested, restricted delivery, a true copy of this citation together with an attached copy of PLAINTIFF'S ORIGINAL PETITION to the following addressee at address:

\_\_\_\_\_  
  
\_\_\_\_\_  
(a) ADDRESSEE  
  
\_\_\_\_\_

ADDRESS  
  
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on \_\_\_\_\_ day of \_\_\_\_\_,  
by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following reason: \_\_\_\_\_  
\_\_\_\_\_

MARILYN BURGESS, District Clerk  
Harris County, TEXAS  
  
By \_\_\_\_\_, Deputy

p2

7019 2970 0001 3562 0648

CAUSE NO. 202233124

RECEIPT NO. 923639

75.00

CTM

\*\*\*\*\*

TR # 74015983

PLAINTIFF: BRAHIN, THOMAS  
vs.  
DEFENDANT: SEADRILL AMERICAS INC

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: SEADRILL GULF OPERATIONS NEPTUNE LLC (A CORPORATION) MAY BE SERVED  
WITH PROCESS BY SERVING THEIR REGISTERED AGENT  
CT COPORATION SYSTEM

1999 BRYAN STREET SUITE 900 DALLAS TX 75201 - 3136

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

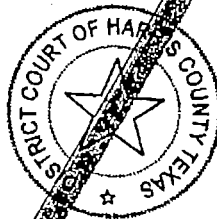
This instrument was filed on the 3rd day of June, 2022, in the above cited cause number and court. The instrument attached describes the claim against you.

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Issued at request of:  
HAND, WILLIAM ROBERT  
24 GREENWAY PLAZA, SUITE 750  
HOUSTON, TX 77046  
Tel: (713) 622-3223  
Bar No.: 24078622



*Marilyn Burgess*

MARILYN BURGESS, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

Generated By: JONES, PATRICIA DAVIS  
K5H//12028404

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MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_, Deputy

INT.CITM.P

\*74015983\*

RECORDER'S MEMORANDUM  
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at the time of imaging.

EXHIBIT A-5

7019 2970 0001 3562 0648

CAUSE NO. 202233124

RECEIPT NO. 923639  
\*\*\*\*\*

75.00 CTM  
TR # 74015983

PLAINTIFF: BRAHIN, THOMAS  
vs.  
DEFENDANT: SEADRILL AMERICAS INC

In The 281st  
Judicial District Court  
of Harris County, Texas  
281ST DISTRICT COURT  
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS  
County of Harris

TO: SEADRILL GULF OPERATIONS NEPTUNE LLC (A CORPORATION) MAY BE SERVED  
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YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a  
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday  
next following the expiration of 20 days after you were served this citation and petition,  
a default judgment may be taken against you. In addition to filing a written answer with the  
clerk, you may be required to make initial disclosures to the other parties of this suit. These  
disclosures generally must be made no later than 30 days after you file your answer with the  
clerk. Find out more at TexasLawHelp.org.

TO OFFICER SERVING:

This citation was issued on 14th day of June, 2022, under my hand and  
seal of said Court.

Issued at request of:  
HAND, WILLIAM ROBERT  
24 GREENWAY PLAZA, SUITE 750  
HOUSTON, TX 77046  
Tel: (713) 622-3223  
Bar No.: 24078622



*Marilyn Burgess*

MARILYN BURGESS, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
(P.O. Box 4651, Houston, Texas 77210)

Generated By: JONES, PATRICIA DAVIS  
-K5H//12028404

CLERK'S RETURN BY MAILING

Came to hand the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and executed by  
mailing to Defendant certified mail, return receipt requested, restricted delivery, a true  
copy of this citation together with an attached copy of  
PLAINTIFF'S ORIGINAL PETITION  
to the following addressee at address:

\_\_\_\_\_  
  
\_\_\_\_\_  
(a) ADDRESSEE  
  
\_\_\_\_\_

ADDRESS  
  
Service was executed in accordance with Rule 106  
(2) TRCP, upon the Defendant as evidenced by the  
return receipt incorporated herein and attached  
hereto at

on \_\_\_\_\_ day of \_\_\_\_\_,  
by U.S. Postal delivery to \_\_\_\_\_

This citation was not executed for the following  
reason: \_\_\_\_\_

MARILYN BURGESS, District Clerk  
Harris County, TEXAS

By \_\_\_\_\_, Deputy



7014 2970 0001 3562 0631

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

**OFFICIAL USE**

Certified Mail Fee \$ 3.75

Extra Services & Fees (check box, add fees as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$ <u>2.85</u>
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage 1.56

**SEADRILL AMERICAS, INC.**  
**C/O: CT CORPORATION SYSTEM**  
**1999 BRYAN STREET, SUITE 900**  
**DALLAS, TX 75201-3136**  
**CAUSE NO: 2022-33124 / 281st**

**JUN 16 2022**  
**Marilyn Burgess**  
**District Clerk**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

06-16-22

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging.

**EXHIBIT A-6**

7019 2970 0001 3562 0648

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

**OFFICIAL USE**

Certified Mail Fee \$ 3.75

Extra Services & Fees (check box, add fees appropriate)  
☐ Return Receipt (hardcopy) \$ 3.85  
☐ Return Receipt (electronic) \$ \_\_\_\_\_  
☐ Certified Mail Restricted Delivery \$ \_\_\_\_\_  
☐ Adult Signature Required \$ \_\_\_\_\_  
☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage 1.56

SEADRILL GULF OPERATIONS NEPTUNE, LLC  
C/O: CT CORPORATION SYSTEM JUN 16 2022  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3136 Marilyn Burgess  
CAUSE NO: 2022-33124 / 281<sup>st</sup> District Clerk

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

06-16-22

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging.

EXHIBIT A-7

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**SEADRILL AMERICAS, INC.  
C/O: CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3136  
CAUSE NO: 2022-33124 / 281<sup>ST</sup>**



9590 9402 5223 9122 1076 75

2. Article Number (Transfer from service label)

7019 2970 0001 3562 0631

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Kirk Atkins

C. Date of Delivery

JUN 21 2022

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ Yes

☐ No

**RECORDER'S MEMORANDUM**

This instrument is of poor quality  
at the time of imaging.

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®

- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

Registered Mail

Registered Mail Restricted Delivery

(over \$500)

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

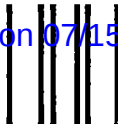
☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

**EXHIBIT A-8**

USPS TRACKING#



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 5223 9122 1076 75

United States  
Postal Service

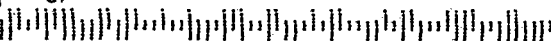
• Sender: Please print your name, address, and ZIP+4® in this box •

MARILYN BURGESS  
HARRIS COUNTY DISTRICT CLERK  
P. O. BOX 4651  
HOUSTON, TX 77210-4651

2022 JUL -6 PM 12: 22

FILED  
MARILYN BURGESS  
DISTRICT CLERK  
HARRIS COUNTY, TEXAS

MAIL PROCESSING UNIT



## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SEADRILL GULF OPERATIONS NEPTUNE, LLC  
 C/O: CT CORPORATION SYSTEM  
 1999 BRYAN STREET, SUITE 900  
 DALLAS, TX 75201-3136  
 CAUSE NO: 2022-33124 / 281<sup>ST</sup>



9590 9402 5223 9122 1076 68

2. Article Number (Transfer from service label)

7019 2970 0001 3562 0648

PS Form 3811, July 2015 PSN 7530-02-000-9053

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Kirk Atkins

C. Date of Delivery

JUN 21 2022

D. Is delivery address different from item 1? ☐ Yes  
 If YES, enter delivery address below: ☐ No

## RECORDER'S MEMORANDUM

This instrument is of poor quality  
 at the time of imaging.

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

ed Mail

ed Mail Restricted Delivery

(\$500)

Domestic Return Receipt

EXHIBIT A-9

USPS TRACKING®



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

9590 9402 5223 9122 1076 68

United States  
Postal Service

MAIL PROCESSING CENTER

2022 JUL -6 PM 12:22

• Sender: Please print your name, address, and ZIP+4® in this box •

FILED  
MARILYN BURGESS  
DISTRICT CLERK  
HARRIS COUNTY, TEXAS

MARILYN BURGESS  
HARRIS COUNTY DISTRICT CLERK  
P. O. BOX 4651  
HOUSTON, TX 77210-4651

